

December 21, 2004

Comments to FCC regarding Proceeding 03-103;
Cell phone usage on commercial air flights.

This is a technology in search of a solution, guided by Lobbyists and Demand Creation Marketeers. It creates several problems, the most serious of which are related to safety and security. This should *not* be a radio frequency coordination issue. The FCC should not rule on this until the other agencies and boards have reviewed and decided upon the proposal. I'm sure that there are many more issues and scenarios surrounding this. Following are a few that I came up with:

1. Approval should not be granted by the FCC without the simultaneous approval by the FAA, NTSB, TSA, and NHS. If the FCC grants usage of the airwaves, this will weaken the power of the other key agencies to decide not to allow it. The corporate lobbyists would then have too easy a task to railroad this into practice.
2. Once an airplane has boarded, passengers cannot choose where to sit. A few exceptions can be made by flight attendants during the boarding process, but only for mitigating reasons. Being stuck next to a loud-mouthed cell phone user on a long flight would certainly be an unbearable situation for many, especially if they are trying to read, work, or sleep.
3. The FCC claims that etiquette is not within its jurisdiction. It is certain that conflicts will arise aboard some flights during which rude cell phone users clash with those who are unduly annoyed. If these conflicts disrupt and distract any flight, it becomes a safety and security issue. Then, I believe that the FCC would have to take responsibility for enabling a such a security problem. Therefore, the issue should not be passed off as one of mere etiquette, if it compromises the safety of air travel.
4. The use of cell phones aboard air flights opens another issue with security. Hijackers and terrorists could easily use cell phones to coordinate more precise attacks, by using simple air-to-ground or plane-to-plane phone calls. Even if plane-to-plane calling is prohibited, they could dial into ground based conference call bridges to accomplish this.
5. If cabin fights over cell phone use become common, then terrorists could use this phenomenon to stage a believable distraction while they take over the airplane.
6. The use of GPS locators in newer cell phones creates a serious risk from targeting by small missiles launched from pickup trucks crudely parked somewhere along the flight path.

7. Due to the problems imposed by elevation and increased line of sight visibility to many thousands of additional devices, the technology for in-flight cell phone usage would have to be modified. Equipment manufacturers would use this as an excuse to require new handsets and ground relays. In addition to forcing customers into purchasing new handsets, they would pass their portion of the expansion cost onto ALL of their customers by jacking up rates for everyone, not just the customers who take advantage of the service.

Respectfully submitted,
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